

Exhibit O

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**ORDER GRANTING MOTION OF GENERAL MOTORS LLC
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE
THE BANKRUPTCY COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION,
AND THE BANKRUPTCY COURT'S RULINGS IN CONNECTION THEREWITH**

(PILGRIM PUTATIVE CLASS ACTION)

Upon the Motion, dated January 19, 2016 (“**Motion**”), of General Motors LLC (“**New GM**”),¹ pursuant to Sections 105 and 363 of the Bankruptcy Code, seeking the entry of an order to enforce the Sale Order and Injunction, entered by the Bankruptcy Court on July 5, 2009, and the Bankruptcy Court’s rulings in connection therewith, by directing the Pilgrim Plaintiffs in the Pilgrim Lawsuit (a) to cease and desist from further prosecuting against New GM, or otherwise pursuing against New GM, the claims asserted by them in the Pilgrim Lawsuit that are barred by the provisions in the Sale Order and Injunction, the Sale Agreement, and the Bankruptcy Court’s recent rulings in connection therewith; (b) to dismiss, with prejudice, those claims asserted in the Pilgrim Lawsuit that violate the provisions of the Sale Order and Injunction, the Sale Agreement, and the Bankruptcy Court’s recent rulings in connection therewith; and (c) to amend the Amended Pilgrim Complaint so that it is consistent with the Sale Order and Injunction, and the rulings in the April Decision, the June Judgment, the November Decision and December

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Judgment, all as more fully set forth in the Motion; and due and proper notice of the Motion having been provided to counsel for the Pilgrim Plaintiffs, and it appearing that no other or further notice need be given; and a hearing (the “**Hearing**”) having been held with respect to the Motion on _____, 2016; and upon the record of the Hearing, the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is therefore:

ORDERED that the Motion is GRANTED as set forth herein; and it is further

ORDERED that the Pilgrim Plaintiffs shall dismiss, with prejudice, on or before _____, 2016, (i) all plaintiffs named in the Pilgrim Lawsuit who claim to own an Old GM Vehicle, and (ii) all claims and/or causes of action asserted against New GM in the Pilgrim Lawsuit that concern Old GM Vehicles; and it is further

ORDERED that the Pilgrim Plaintiffs and all persons acting in concert with them shall cease and desist from prosecuting the claims and/or causes of action asserted against New GM in the Pilgrim Lawsuit that concern Old GM Vehicles; and it is further

ORDERED that the Pilgrim Plaintiffs shall amend the Amended Pilgrim Complaint within 10 business days after the entry of this Order so that it is consistent with the Sale Order and Injunction, and the rulings in the April Decision, the June Judgment, the November Decision and December Judgment; and it is further

ORDERED that, within 10 business days after the entry of this Order, the Pilgrim Plaintiffs shall file with the Clerk of this Court evidence of (i) the dismissal, with prejudice, of (a) all plaintiffs named in the Pilgrim Lawsuit who claim to own an Old GM Vehicle, and (b) all claims and/or causes of action asserted against New GM in the Pilgrim Lawsuit that concern Old

GM Vehicles, and (ii) their further amendment of the Amended Pilgrim Complaint so that it is consistent with the Sale Order and Injunction, and the rulings in the April Decision, the June Judgment, the November Decision and December Judgment; and it is further

ORDERED, that this Court shall retain exclusive jurisdiction, to the fullest extent permissible under law, to construe and/or enforce this Order.

Dated: _____, 2016
New York, New York

UNITED STATES BANKRUPTCY JUDGE